

recollection of speaking with any member of O'Connor & Hannan (including O'Connor or Schneider) at any time about the Hudson matter, and that he does not even know Schneider and does not think he knew him in 1995.

Soon after the May 16 event at the Mayflower, Schneider phoned O'Connor to update him on what transpired. Schneider recalls telling O'Connor that he went to the Mayflower, spoke with the President,<sup>313</sup> discussed the Hudson matter with Ickes, and was assured by Ickes that he was looking into it. O'Connor responded with skepticism regarding whether or not Ickes would, in fact, follow up on O'Connor's request. Based on his past experience with the White House, Schneider assured O'Connor that he was confident Ickes would do what he had said he would.

About two weeks later, on his own initiative, Schneider called Ickes at the White House to see if Ickes had followed up on the Hudson matter. Irritated, Ickes told Schneider words to the effect of "I told you I would follow up, therefore I will."<sup>314</sup> Schneider is certain that he did not

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<sup>312</sup>(...continued)

implored Ickes to get in touch with O'Connor. Schneider's earlier recollection, which is consistent in most regards with his colleagues' recollection of what they learned about the exchange in 1995, indicates that Ickes was aware of both the matter and O'Connor's interest in it and was agreeing to "follow through" or "look into" it in a manner that is suggestive of a more substantive contact than a "routine status inquiry."

<sup>313</sup>Schneider does not dispute that he had a brief conversation with President Clinton at the Mayflower. Schneider consistently has maintained, however, that he never discussed the Hudson casino matter with the President. Yet, his colleagues reported to their clients, and billed them, for such a discussion. Confronted with O'Connor's May 16 billing record that reads "Get report from Tom Schneider that he talked to President Clinton regarding status of matter," Schneider maintained that did not speak with the President "then or ever about the dog track and Indians," and asserted that O'Connor "hears what he wants to hear." OIC Schneider Int. at 4.

<sup>314</sup>*Id.*